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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF DEBORAH STEIN IN
SUPPORT OF FACEBOOK, INC.'S
STATEMENT IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

DECLARATION OF DEBORAH STEIN IN SUPPORT OF FACEBOOK, INC.'S STATEMENT IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED

CASE NO 3:18-MD-02843-VC

1 I, Deborah Stein, hereby declare as follows:

2 1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the
4 State Bars of California and New York. I submit this declaration in support of Facebook’s Statement
5 in Support of Plaintiffs’ Administrative Motion to Consider Whether Another Party’s Materials Should
6 Be Sealed. I make this declaration on my own knowledge, and I would testify to the matters stated
7 herein under oath if called upon to do so.
8

9 2. Attached as **Exhibit 1** is a true and correct **unredacted** copy of Plaintiffs’ Supplemental
10 Brief in Support of Sanctions.

11 3. Attached as **Exhibit 2** is a true and correct **redacted** copy of Plaintiffs’ Supplemental
12 Brief in Support of Sanctions.
13

14 4. Attached as **Exhibit 3** is a true and correct **unredacted** copy of the Declaration of Les-
15 ley E. Weaver in Support of Plaintiffs’ Supplemental Brief in Support of Sanctions.

16 5. Attached as **Exhibit 4** is a true and correct **redacted** copy of the Declaration of Lesley
17 E. Weaver in Support of Plaintiffs’ Supplemental Brief in Support of Sanctions.

18 6. Facebook proposes redacting confidential information regarding its data systems and
19 Facebook’s proprietary data storage and processing practices.¹ How Facebook stores, manages, tracks,
20 preserves, deletes, and processes data for billions of users across its data systems are key components
21 of its business that set it apart and ahead of its competitors. I understand that, if publicly disclosed,
22 Facebook’s competitors could take advantage of this information to improve their own methods for
23 managing high volumes of user data or for tracking and storing user data across data systems, to Face-
24 book’s competitive disadvantage. Hackers and other bad actors also could use this information to better
25
26

27
28 ¹ Pls. Supp. Br. at i, 12–14, 20 (Dkt. 988-3); Weaver Decl. at ¶¶ 4, 47, 53 (Dkt. 988-6).

1 understand Facebook's data systems and target specific repositories of data, potentially harming both
2 Facebook and its users.

3 7. Facebook proposes redacting confidential information regarding its tool for responding
4 to law-enforcement requests for user records, including the name of the tool, the types of data it con-
5 tains, the delta between the data within the tool and DYI, and the format in which data from the tool is
6 produced.² I understand that public disclosure of details about this tool would reveal confidential in-
7 formation regarding Facebook's internal operations that could be used by bad actors to attempt to cir-
8 cumvent and evade Facebook's enforcement strategies and current and future lawful governmental
9 criminal investigations. I further understand that public disclosure of Facebook's internal processes
10 related to the tool could provide confidential information to competitors about how Facebook tracks
11 and stores data across its systems, to Facebook's competitive disadvantage.

12 8. Facebook proposes redacting confidential and competitively sensitive information re-
13 garding its business programs, strategies, decisions, and partners, including confidential technical de-
14 tails of how Facebook develops and uses data to target advertisements to the most relevant users.³ This
15 information also includes confidential strategic discussions regarding Facebook's existing and poten-
16 tial future business models and strategies, as well as confidential information regarding the identities
17 of and negotiations with entities with which I understand Facebook has a business relationship. I am
18 informed and believe that, if publicly disclosed, this information could harm Facebook's relationships
19 with these entities and undercut Facebook's ability to negotiate with competitors of these entities. I
20 am further informed and believe that public disclosure of confidential information regarding Face-
21 book's business models could allow Facebook's competitors to use this information developed at Fa-
22 cebook's expense to improve or develop their own competing techniques, to Facebook's competitive
23 disadvantage.

24 ² Pls. Supp. Br. at i, 14–17 (Dkt. 988-3); Weaver Decl. at ¶ 5 (Dkt. 988-6);

25 ³ Pls. Supp. Br. at 24, 31–32 (Dkt. 988-3).

disadvantage. Additionally, I am informed and believe that public disclosure of confidential information regarding Facebook's business strategies could allow Facebook's competitors to copy these strategies, developed at Facebook's expense, to more effectively compete with Facebook. Finally, Facebook's ability to serve advertisements to its users effectively is an essential aspect of its business and I am informed and believe that, if publicly disclosed, this information could allow Facebook's competitors to improve their serve of advertisements to Facebook's competitive disadvantage.

9. Facebook also asks the Court to permanently seal certain confidential information regarding Facebook employees, including the names of certain employees, email addresses, and performance evaluations.⁴ If these names were disclosed publicly, competitors would have access to confidential information regarding Facebook's employees.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 31, 2022 in Los Angeles, California.

/s/ Deborah Stein

Deborah Stein

⁴ Weaver Decl. at ¶ 46 (Dkt. 988-6).